

DRAFT DIRECTIVE TRANSMITTAL
WORKFORCE SERVICES

Number: WSDD-11

Date: June 16, 2008

69:20:va:12082

TO: WORKFORCE DEVELOPMENT COMMUNITY

SUBJECT: DATA VERIFICATION REQUIREMENTS – WIA CUSTOMER DATA
COLLECTION

☒ IMMEDIATE ACTION

Bring this draft to the attention of the appropriate staff.

☒ E-MAIL COPY TRANSMITTED

Number of pages (including coversheet): 7

If there are any problems with this transmittal, please call the Pagemaster at 916/654-8008.

SUBJECT MATTER HIGHLIGHTS:

The purpose of this directive is to provide revised guidelines for customer data verification under the Workforce Investment Act (WIA) Adult and Dislocated Worker programs. Specifically, this directive gives Local Workforce Investment Areas (LWIA) the ability to document the verification of customer data in an electronic environment rather than maintain hard copy files. Implementation of these proposed data verification changes as outlined in Attachment 2 is optional. These revisions are intended to reduce the record retention burden, provide LWIAs greater flexibility in the administration of their programs, and better protect client information and confidentiality. This directive also provides guidance for program accountability regarding client exit, follow-up, supplemental data recording, and Management Information System (MIS) requirements. This directive applies to LWIAs that are not currently designated as Local Learning Labs (LLL).

For details on these requirements as they relate to the LLL, staffs should refer to Learning Lab Draft Directive -10 *Integrated Reporting and Program Accountability*, dated June 5, 2008.

COMMENTS ARE DUE BY:

7/17/08

Comments can be submitted through one of the following ways:

- 1) **E-Mail** — mngeperf@edd.ca.gov (Include “draft comments” in the subject line)
- 2) **Mail** — WSD / P.O. Box 826880 / MIC 69 / Sacramento, CA 94280-0001

All comments received by the end of the comment period will be considered before the final directive is issued. The Workforce Services Branch does not respond individually to each comment received. However, a summary of comments will be released with the final directive. **Comments received after the specified due date will not be considered.**

If you have any questions, contact the Workforce Services Division at (916) 654-8008.

DRAFT DIRECTIVE WORKFORCE SERVICES

Number:

Date:

69:20:va:12082

TO: WORKFORCE DEVELOPMENT COMMUNITY

SUBJECT: DATA VERIFICATION REQUIREMENTS—WIA CUSTOMER DATA
COLLECTION

EXECUTIVE SUMMARY:

Purpose:

The purpose of this directive is to provide revised guidelines for customer data verification under the Workforce Investment Act (WIA) Adult and Dislocated Worker programs. Specifically, this directive gives Local Workforce Investment Areas (LWIA) the ability to document the verification of customer data in an electronic environment rather than maintain hard copy files. Implementation of these proposed data verification changes as outlined in Attachment 2 is optional. These revisions are intended to reduce the record retention burden, provide LWIAs greater flexibility in the administration of their programs, and better protect client information and confidentiality. This directive also provides guidance for program accountability regarding client exit, follow-up, supplemental data reporting, and Management Information System (MIS) requirements. This directive applies to LWIA that are not currently designated as Local Learning Labs (LLL).

Scope:

The revised data collection and verification requirements in this directive apply only to LWIAs that are not currently designated as LLL. The LLL staffs should refer to Learning Lab Draft Directive-10 *Integrated Reporting and Program Accountability*, dated June 5, 2008. All other WIA grant recipients must continue to comply with the data verification and retention requirements in the Eligibility Technical Assistance Guide (WIA Directive [WIAD04-18](#) *WIA Title I Eligibility*).

Effective Date:

This directive is effective July 1, 2008

REFERENCES

- Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) 17-05, Common Measures Policy for the Employment and Training Administration (ETA) Performance Accountability System and Related Performance Issues, February 17, 2006
- Training and Employment Notice 19-07, Program Year 2006/Fiscal Year 2007 Performance Reporting and Data Validation, December 11, 2007
- WIA Management Information and Reporting System, Office of Management and Budget 1205-0420, Expiration Date February 28, 2009
- Labor Exchange Reporting System, Office of Management and Budget 1205-0240, Expiration Date February 28, 2009

STATE-IMPOSED REQUIREMENTS:

This directive contains no State imposed requirements.

FILING INSTRUCTIONS:

This directive should be maintained by the affected local areas until it is superseded.

BACKGROUND:

In early 2007, leadership from the Employment Development Department (EDD), the California Workforce Investment Board, and the Labor and Workforce Agency came together for the purpose of considering the development of an integrated service delivery model for California's Workforce System and its One-Stop Career Centers. This group agreed that continued economic and fiscal pressures, coupled with higher demands for service and program accountability required a fundamental change in the California workforce services delivery system. With this objective in mind, an ambitious planning effort was launched which included representatives from 12 LWIAs, the California Workforce Association, and various stakeholder groups.

This partnership has looked closely at work flow under the Wagner-Peyser and the Workforce Investment Act programs and made recommendations to streamline service delivery. The guidelines in this directive implement a series of recommendations made by the Integrated Service Delivery State-local partnership. These revisions are intended to reduce the record retention burden, provide LWIAs greater flexibility in the administration of their programs, better protect client information and confidentiality, and remain in compliance with Department of Labor reporting and data verification requirements. Implementation of these revised data collection and verification guidelines is optional.

POLICY AND PROCEDURE:

Attachment 1 lists the data elements that must be collected on all customers entering a One-Stop Career Center or affiliated site for career development or job placement assistance. Attachment 2 details the additional data collection, reporting requirements, and supporting documentation for a One-Stop Career Center customer who receives staff assisted core, intensive, or training services. Collection of the listed data elements continues to be required. Implementation of the changes in supporting documentation management is optional.

Self-service and informational activities, requiring only the data elements listed on Attachment 1, are those core services that are made available and accessible to the general public and are designed to inform and educate individuals about the labor market. These services enable the individual to self-identify his or her individual employment strengths and weaknesses and the range of appropriate services. Core services that entail significant staff assistance require enrollment of the customer and the additional applicable data collection detailed in Attachment 2. Significant staff assistance is defined based on the nature of the service, not the amount of time involved. Services that assist the customer in deciding on appropriate next steps in the search for employment or related services, including assessment of an individual's immediate employability and barriers to employment, are significant staff-assisted services. Initial assessment or job placement assistance is a significant staff-assisted service and requires program enrollment and the collection of the applicable data detailed in Attachment 2.

The data elements detailed in Attachments 1 and 2 are typically collected through the CalJOBSSM and the Job Training Automation (JTA) WIA Application Form. It has been standard business practice to require the customer to sign the Application Form attesting to the accuracy of the data on the Form. Because, as reflected in the requirements specified in Attachment 2, we are allowing for the establishment of a "paperless" customer flow, LWIAs are not required to retain a signed hard copy of the customer's Application.

Program Accountability

For Adults and Dislocated Workers, the LWIAs are subject to the Adult Common Measures, including Entered Employment, Employment Retention, and Average Earnings. Attachment 3 provides a summary of the Common Measures definitions. The Common Measures are defined by the DOL in TEGL 17-05 (February 10, 2006). All staff should review this TEGL in detail to understand the specifics of the Common Measures.

- Inclusion of All Customers in the Common Measures Calculations

A job seeker is included in the accountability measures at the point the job seeker has been determined eligible and receives a service funded by a participating program within a One-Stop Career Center, affiliated site, or remotely through

electronic technologies. All One-Stop Career Center customers 18 years of age and older who receive a significant staff assisted service must be enrolled in the WIA Adult program. A customer determined to be a dislocated worker and whose direct services are all reported under the Dislocated Worker Program will be reported under the Dislocated Worker Program. If a customer receives services reported under both the Adult and Dislocated Worker programs, the customer will be attributed to both programs.

- Point of Exit

Under DOL guidance (TEGL 17-05, February 10, 2006) a customer is exited from all enrolled programs when 90 days has elapsed since the last enrolled service estimated or actual completion date. This auto-exit may be delayed by documenting a reason for gap in service on the JTA Enrollment Form.

Although customers are expected to be auto-exited after a 90-day lapse in service, the JTA system currently auto-exits a customer after a 150-day undocumented gap in service. This is to accommodate the filing of late paperwork in LWIAs without real-time access to the JTA system. The 150th day is calculated based on the JTA Enrollment Form Est/End Date for the last reported service. The exit date for the customer is the last date of service. The exit quarter is the calendar quarter containing the last date of service. The table below provides two examples.

CUSTOMER	SERVICE BEGIN DATE	EST/END DATE	150 th DAY	EXIT DATE/EXIT QUARTER
A	June 1, 2008	June 30, 2008	November 28, 2008	June 30/April – June 2008
B	February 12, 2008	February 15, 2008	July 14, 2008	February 15/January – March 2008

When an exit date is generated based on the data on the JTA Enrollment Form(s), the client is exited from all programs for which he/she is enrolled. The exit date is the same for all programs regardless of which program provided the last service.

Exit Forms

JTA System Exit Forms may be filed but are not required. If an Exit Form is filed, the data included on the form, applicable to a performance outcome, will be considered in the performance calculations but the exit date is solely based on the last actual or estimated service completion date reported on a JTA Enrollment Form.

Follow-up and Performance Accountability Exclusions

Post-Program Follow-up is not required for Adults and Dislocated Workers. A Follow-up Form may be filed to notify the Workforce Services Division that a customer should be excluded from performance for one of the allowable reasons listed below. However, Follow-up Forms are not required.

Customers may be excluded from the performance calculations for the following reasons:

- Institutionalization
- Death
- Health/Medical or Family Care – this does not include temporary situations expected to last less than 90 days
- Reservist called to Active Duty

Supplemental Employment Data

Common Measures performance outcomes are primarily confirmed through wage records, both California wage records and records obtained from other states through the national Wage Record Interchange System (WRIS). If a customer is known to be employed or retained in a job not reported through the states' wage records, the employment status may be verified through other records and reported to the State through the Follow-up Form. Examples of such employment include self-employment, and federal employment, including military service. If the employment status for the customer is confirmed through supplemental information, Follow-up Forms reporting this information must be filed for the specific quarters applicable to the measure (please see Attachment 3). A case note must be recorded documenting the source for the employment verification and the date of that verification. This may be a case note in the MIS.

MIS Requirements

Two enhancements have been added to the JTA system to facilitate verification of eligibility through the JTA, the additional of an Eligibility Verification Screen and a Case Notes Screen. For more information on these enhancements to the JTA System please refer to Workforce Services Information Notice [WSIN07-61](#) *JTA System Version 4.42 Release*.

ACTION:

Please bring this Directive to the attention of all staff.

INQUIRIES:

If you have questions, please contact your Regional Advisor at (916) 654-7799.
MIS questions may be directed to the JTA Customer Help Desk.

BILL BURKE
Assistant Deputy Director
Workforce Services Branch

BOB HERMSMEIER
Chief
Workforce Services Division

Attachments

1. [Initial Data Collection Requirements—All Customers](#)
2. [Data Collection Requirements for Clients Receiving Staff Assisted Services](#)
3. [Common Measures](#)

A

F

T